



State of Kansas

Joan Finney, Governor

Department of Health and Environment Southeast District Office

1500 W. 7th, P.O. Box 888, Chanute, Kansas 66720-0888

(316) 431-2390

Stanley C. Grant, Ph.D.,
Acting Secretary

February 21, 1991

Mr. Steve Keiter, Facility Manager
Hydrocarbon Recovery Services
2549 North New York Street
Wichita, Kansas 67219

Re: Hazardous Waste Compliance--Correction of Violations
EPA I.D. Number: KSD007246846

Dear Mr. Keiter:

On February 12, 1991, I conducted a follow-up inspection to verify the correction of violations noted during my original inspection on September 25, 1990. I have also reviewed your letter I received on November 5, 1990.

Based on observations made during the follow-up inspection and on information contained in your letter, you have satisfactorily corrected the violations noted during my inspection on September 25, 1990.

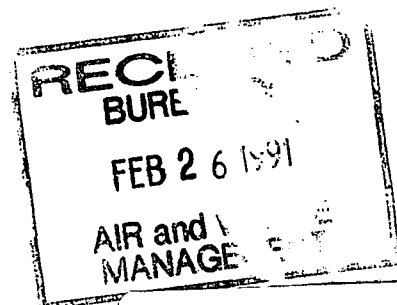
We appreciate your continued cooperation with our waste management programs. If you have any questions, please call me.

Sincerely yours,

Roger E. Carman
Inspections & Enforcement Section
Bureau of Air & Waste Management

REC:jm

pc: Tom Gross, BAWM, Topeka ✓
Steve Broslavick, BAWM, Topeka
SCDO, Wichita



R00001655
RCRA Records Center



A Subsidiary of
Union Pacific Corporation

Hydrocarbon Recovery Services

NOV 5 1990
REL

To: Roger Carmen

From: Steve Keiter

Subject: Hazardous Waste Compliance Inspection September 25, 1990

I have described below the corrective actions taken to bring the five areas noted in your letter of October 22, 1990 into compliance with state regulations.

I. All storage tanks containing hazardous wastes are clearly marked with "Hazardous Waste" labels.

II. All drums are marked with hazardous waste labels as soon as they are generated. A continuing training program has been initiated to ensure that all operators know that labels must be affixed as soon as a drum of waste is generated.

III. Adequate aisle space has been provided through all of C building. A reduction of inventory and proper stacking procedures have allowed us proper aisle space.

IV. All fiberboard containers have been eliminated. The material was repackaged into steel drums the day following the inspection.

V. I have discussed the problem with secondary containment of the above ground piping to D building with my engineering staff. I believe an acceptable solution is to weld all of the joints in the pipes and continue to inspect these pipes on a daily basis as I already do. If this is acceptable, I will proceed with this plan within the next two weeks.

If you need any further information, feel free to call me at 316-268-9490.

Sincerely,

Stephen M Keiter

Stephen M. Keiter

cc: Tom Gross, BAWM, Topeka
J.P. Goetz, BAWM, Topeka
Brenda Clark, BAWM, Topeka
Cathy Orben, HRI, Tulsa

RS
Rou,
why no
letter to
AB

Kansas Department of Health & Environment

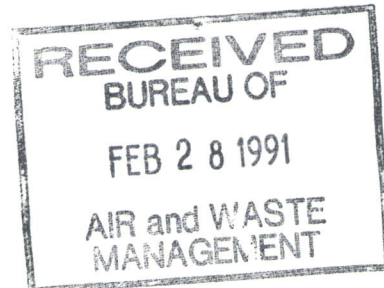
MEMORANDUM

February 22, 1991

TO: Hydrocarbon Recyclers, Inc. File, Wichita
EPA I.D. Number: KSD007246846

FROM: Roger Carman, BAWM, SEDO, Chanute *REC*

SUBJECT: Follow-up hazardous waste inspection



On February 12, 1991, I conducted a follow-up inspection at HRI's facility. Gil Perez, BAWM, SCDO accompanied me. We met with Steve Keiter, the facility's manager.

We first looked at the wet-solids dryer operation, which is in the east end of Building D. This operation mainly processes dry cleaning cartridges, but it also processes a variety of solvent contaminated sludges. The cartridges, wet sludges, etc. are received at the facility in 55-gallon drums. The material is dumped from the drums into a large shredder and then augered into the dryer unit. The dryer is a steam-jacketed tank which essentially distills out any solvents and/or water left in the waste. The unit is tentatively regulated as a distillation unit (T54). The dried waste exits the tank through a valve in the bottom and is placed back into the original drums in which it was initially received. The drums are then relabeled and redated. Most of the dried wastes are used as dry fuel for the cement kilns. Steve said they plan to attach a dry-solids handling system to the dryer tank. The system will vacuum the dried material out of the dryer into a roll-off container. The solvent/water that is distilled out of the waste is condensed and piped to a 300-gallon collection tank. HRI considers this tank to be a process tank because the waste is pumped to either the waste perchloroethylene tank or the F-listed wastewater tank, depending upon the water content of the waste. The waste perc is sent to Tulsa to be recycled and the F-listed wastewater is shipped to a no-migration deep well.

Next we looked at the piping between the blending area and storage tanks in Building D. This piping needed to have secondary containment or welded joints or single continuous pipes. To satisfy the requirements, the various unions and connections had been welded around each connection. The pipes are inspected every day, including Saturday and Sunday.

Memo to Hydrocarbon Recyclers, Inc. File, Wichita
February 25, 1991
Page 2

The hazardous waste tanks had been labeled with hazardous waste labels. Steve said the labels keep coming off some of the outside tanks, so they plan to paint the labeling on as soon as the stencils arrive.

The drums in Building C have been rearranged to provide better access. Formerly the drums were placed in rows running parallel to the length of the building. Now the drums are placed in short rows (three pallets deep) which are perpendicular to the length of the building. The drums are stacked two tiers high.

Steve said the fiberboard containers are no longer accepted except for dry waste streams.

Empty drums are rinsed, and if they are in good condition, they are sent to SDS for reconditioning. Damaged drums are rinsed, crushed, and sent to Novick Iron and Metal in Wichita.

Steve said Buildings I and J only store nonhazardous wastes.

REC:jm

pc: Tom Gross ✓
Steve Broslavick

HAZARDOUS WASTE COMPLIANCE MONITORING AND ENFORCEMENT LOG

1. EPA ID: KS D 0 0 7 2 4 6 8 4 62. FACILITY NAME: Hydrocarbon Recyclers, Inc3. CITY: Wichita COUNTY: Sedgewick4. NO EPA ID: ☐6. DATE OF INITIAL EVALUATION WHICH
IS THE BASIS FOR THIS REPORT:09/25/90

INSPECTOR:

Roger Carman

5. FACILITY TYPE:

- ☒ TSD ☒ GEN
☐ KG ☐ SQ
☐ TRANSPORTER
☐ NOT A GENERATOR

GOVERNMENT FACILITY: ☐

F - FEDERAL S - STATE L - LOCAL

EPA COMPLETES

THIS BLOCK
☐ GWM ☐ SNCPUT F, S, OR L
IN BOX7. TYPE OF EVALUATION COVERED
BY THIS REPORT:
PUT CODE IN BOX
CHOOSE ONE5

- 1 = COMPLIANCE EVALUATION INSPECTION (CEI)
 2 = SAMPLING INSPECTION
 3 = RECORD REVIEW

- 4 = COMPLIANCE GWM EVALUATION (CME)
 5 = COMPLIANCE SCHEDULE EVALUATION (CSE)
 11 = CASE DEVELOPMENT INSPECTION
 12 = OPERATION AND MAINTENANCE EVALUATION

8. DATE OF EVALUATION COVERED BY THIS REPORT
(ENTER ONLY IF DIFFERENT FROM 6.):02/21/91 (UPDATE)FT 3-1-91

9. AREA AND CLASS OF VIOLATION (ENTER NUMBER OF VIOLATIONS BY AREA AND CLASS):

CL N/ACLASS OF
VIOLATION

AREA OF VIOLATION

V3-7-91Itumms 3-5-91

NOT.	PRE- TRANS.	ACCUM. 90 D.	GEN FAC. STANDARDS	PREP & PREVENT	CONT. & E.P	STOR. COND.	GWM/ RLS	CL/PCL	FIN REQ	PART B	COMP SCH.	MAN RPT	LAND BAN	OTHER
I						0								0
II	0			0										0

10. ENFORCEMENT ACTIONS FOR VIOLATIONS:

2-21-91

AREA OF VIOLATION	TYPE OF ACTION TAKEN (CIRCLE ONE)				DATE ACTION TAKEN (MDY)	COMPLIANCE DATES (MDY)		PENALTY	
						SCHEDULED	ACTUAL	ASSESSED	COLLECTED
<u>Pre Trans</u>	INFORMAL	<u>WL/NOV</u>	AO	CivAc CRIMAc	<u>10/22/90</u>	<u>11/05/90</u>	<u>11/05/90</u>	<u>class I</u>	
<u>Prep & Prevent</u>	INFORMAL	<u>WL/NOV</u>	AO	CivAc CRIMAc	<u>10/22/90</u>	<u>11/05/90</u>	<u>11/05/90</u>	<u>class I</u>	
<u>Stor. Cond.</u>	INFORMAL	<u>WL/NOV</u>	AO	CivAc CRIMAc	<u>10/22/90</u>	<u>11/05/90</u>	<u>11/05/90</u>	<u>class I</u>	
<u>Other</u>	INFORMAL	<u>WL/NOV</u>	AO	CivAc CRIMAc	<u>10/22/90</u>	<u>12/17/90</u>	<u>02/12/91</u>	<u>class I</u>	

COMMENTS:

EIGHTY CHARACTER LIMIT.

All noted violations have been corrected